

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Jeff Menzel

Facility ID Number: NCD 054 282 025

Facility Name: Asheville Metal Finishing

Document Group: Inspection/Investigation (I) **Document Type:** I - Compliance Evaluation Inspection (CEI)

Description for File (for CARA): CEI No Violations

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Author(s) of Document: Jeff Menzel

Inspector ID #: NC014

Suborganization: Western Region

Comments for RCRAInfo: CEI No Violations

County (if not on report):



**North Carolina
Department of Environmental Quality
Division of Waste Management
Hazardous Waste Section**

**Large Quantity Generator Inspection Report
Compliance Evaluation Inspection (CEI)**

Facility Name: Asheville Metal Finishing Inspection Date: 1/13/2016

Site Address: 178 Clingman Avenue, Asheville, NC 28801 (Verified in RCRAInfo? Yes)

Mailing Address: Mailing PO Box 16237, Asheville, NC 28801

EPA ID #: NCD 054 282 025

Site Contact: Todd Israel Title: Shipping Receiving Manager

Phone Number: 828-253-1476

Email: mledford@ashevillmetalfinishing.com

Inspector: Jeff Menzel

Participants: Todd Israel, Monica Ledford, Darrell Merrimon

Legal Owner of Business: Tom Israel

Legal Owner of Property: Tom Israel

Generator Status: LQG

Facility Description: Site acreage: 1 acre Operating shift(s): 1 # Employees: 19

Water supply: municipal Waste water treatment: municipal/ on-site treatment

Distance to on-site/off-site wells: 50 feet Closest private residence: 200 feet

Facility Description (No. of buildings, size of buildings, operations conducted, and locations HW is generated):

Asheville Finishing is a plating job shop for small parts. Processes include zinc, chromium, tin, and copperplating. Building renovations and clearing in the rear of the building continue. The facility stores wastewater sludge in lined, one cubic yard cardboard Gaylord boxes. These boxes are accumulated in the pretreatment room and stored in the boiler room building. When more than six boxes are stored in the boiler room the excess boxes are moved upstairs to the chemical storage room. The back of the property has been fenced because the property behind has been sold for development.

The facility supports 19 full time employees and operates one 8-hour shift, five days per week. They operate 14,000 square feet of manufacturing area on $\frac{3}{4}$ acre. It is located in a mixed residential, retail business, and light industrial neighborhood under NAICS number 332813. Residences are located within $\frac{1}{4}$ mile of the facility. The facility is served by the City of Asheville for water and sewer service; however, two drilled wells remain on-site. Neither is used. The pumps have been removed.

Waste Streams:

<u>TYPE WASTE</u>	<u>COMMON NAME</u>	<u>WASTE CODE</u>
Corrosive inorganic acid	Nitric acid & Silver nitrates	D002/D011
Solid metal hydroxides	Plating bath residues	F008

TSD Facilities:

Facility Name	EPA ID #
Envirite of Penn, Inc.	PAD010154045
Advance Chemical Company	RID058735761
Envirosafe	OHD045243706

Transporters:

Transporter Name	EPA ID #
Envirite of Penn, Inc.	PAD010154045
Haz Mat Environmental Group	NYD980769947

Document Review

- **262.11- Hazardous Waste Determination** ***Compliance Yes**
Generators must determine if their waste is hazardous.
 - **261.2(f) – Documentation of claims material is not solid waste** ***Compliance Yes**
Generators must document claims that materials are not solid wastes or are conditionally exempt from regulations.
 - **262.12- EPA ID Numbers** ***Compliance Yes**
(a) Generators must acquire an EPA ID Number before they offer hazardous waste for shipment or disposal
(c) Generators must use approved TSDF's and Transporters with valid EPA ID numbers.
 - **262.20- Manifest** ***Compliance Yes**
Manifests must be properly filled out for all hazardous waste shipments.
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- **268.7 (a)(4)- LDR Certification** ***Compliance Yes**
Land Disposal Restrictions must accompany all waste streams sent to TSDF.
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- **262.42- Exception Reports** ***Compliance Yes**
(a) (1) Facility must contact the transporter/designated facility if a manifest is not received within 35 days.
(2) Generator must submit an Exception Report if a manifest is not received within 45 days.
 - **262.27 & GS 130A-294(k) Waste Minimization Certification** ***Compliance Yes**
A generator who ships hazardous waste must certify on their manifest a waste minimization program and have a written description of any program to minimize or reduce the volume and quantity or toxicity of waste.
 - **262.34(a)(1)(i) ref 265.174- Weekly Inspections** ***Compliance Yes**
Storage Areas must be inspected weekly for leaking containers and for deterioration of containers caused by corrosion.
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- **15A NCAC 13A .0107(d) – Documented Weekly Inspections** ***Compliance Yes**

The generator must keep records of the inspections and results of the inspections for at least three years from the date of the inspection.

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- **262.40- Recordkeeping** ***Compliance Yes**
 - a) Manifest must be kept for three years
 - b) Biennial Reports must be kept for three years. (does not apply to SGQ)
 - c) Waste analyses or test results must be kept for three years
 - d) If enforcement actions are taken these time periods are extended.

- **262.41- Biennial Report** **Submitted: 05/21/2015** ***Compliance Yes**

Generators who ship hazardous waste in the US must prepare a Biennial Report by March 1 of each even numbered year.

Subpart C – Preparedness and Prevention

- **265.33- Testing and Maintenance of Equipment** ***Compliance Yes**

All equipment listed in this section should be tested and maintained to assure operation in case of an emergency.
- **265.37- Arrangements with Local Authorities** ***Compliance Yes**
 - (A) Arrangement for services should be made with the following:
 - 1) Arrangements to familiarize **police, fire departments and emergency response teams** with the facility layout, properties of hazardous waste handled and associated hazards, places where people normally work, entrance roads and evacuation routes.
 - 2) Primary response agencies should be established with all emergency responders. All others will support.
 - 3) Arrangements with **state emergency response teams, contractors, and equipment suppliers.**
 - 4) Arrangements to familiarize **local hospitals** with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions or releases at the facility.
 - (B) Documentation from any local authorities that decline any of the emergency arrangements

Subpart D – Contingency Plan and Emergency Procedures

- **265.51- Contingency Plan** **Last Revised: 2/09/2016** ***Compliance Yes**
 - (a) Each owner or operator must have a contingency plan for their facility.
 - (b) Plan must be carried out in the event of a fire, explosion, or release of hazardous waste that could threaten health or environment.
- **265.52- Content of the Contingency Plan** ***Compliance Yes**
 - a) Plan must describe the actions personnel must take to respond to event including fire, explosion and spills.
 - b) SPCC plan can be amended to include required content in this subpart.
 - c) Plan must describe arrangements agreed to by local police, fire, hospitals, contractors, and state agencies.
 - d) The plan must list names, addresses, and phone numbers (home and office) for all emergency coordinators. List must be kept up to date. Primary coordinator and secondary coordinators should be listed.
 - e) Plan must include a list of all emergency equipment and alarms at the facility. List should show locations and physical descriptions, and capabilities of equipment. List must remain up to date.
 - f) The plan must include an evacuation plan if evacuation may be required. The plan should describe signals, evacuation routes, and alternate evacuation routes.

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- **265.53- Copies of the Contingency Plan** ***Compliance Yes**

Contingency plans and revisions must be:

 - a) Maintained at the facility.
 - b) Submitted to all local police, fire, hospitals, state agencies, and emergency response teams.

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- **265.54- Amendment of the Contingency Plan** ***Compliance Yes**

Plan must be amended when:

 - (a) Regulations are revised

- (b) Plan fails in an emergency
 - (c) Facility changes
 - (d) Emergency coordinators change
 - (e) Emergency equipment changes
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- **265.55- Emergency Coordinator**

***Compliance Yes/No**

An emergency coordinator should be on the premises or on call at all times. Must be able to respond in a short period of time. The coordinator must be familiar with all aspects of the contingency plan, operations, locations of haz-waste, record locations, and facility layout. Person must have the authority to commit resources needed to carry out contingency plan.

Todd Israel is listed as the primary coordinator.

- **265.56- Emergency Procedures**

***Compliance Yes**

- a) During an emergency event the coordinator must immediately:

See regulations described at 40 CFR 265.56 if an event occurred causing the Contingency Plan to be implemented.

265.16- Personnel Training & Job Description***Compliance Yes**

- a) (1) Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way to ensure compliance with these sections requirements.
- (2) Training must be conducted by a person trained in hazardous waste management procedures and training must include hazardous waste management training relevant to each employee's position (including contingency plan implementation).
- (3) Training should be designed to ensure that personnel can respond properly to emergencies.
- b) Personnel must complete the training within six months of their hire date or when they change job responsibilities.
- c) Personnel must take part in an annual review of the initial training.
- d) The following documents must be maintained at the facility:
 - (1) Job title and person filling position for each position related to hazardous waste management.
 - (2) A job description for each position listed above, including requisite skills, education, and qualifications. Position duties should also be recorded.
 - (3) A written description of the type and amount of initial and continuing training that will be given for each position.
 - (4) Records that document that the training or job experience have been completed by personnel.
- e) Training records on current personnel must be kept until closure of the facility. Training records on all former employees must be kept for at least three years from date of separation

Name of Employee	Job Title	Hazardous Waste Job Duties	Date of Annual RCRA Review	Date of Previous Annual RCRA Review	RCRA Job Description (including requisite skills, education and qualifications) Yes/No	Date of Contingency Plan Review
Todd Israel	Plant Manager	Shipping and Receiving Manager	03/25/2015	01/28/2014	yes	03/25/2015
Daniel Wyatt	Hazardous Waste Handler	Hazardous Waste Handler	03/25/2015	01/28/2014	yes	03/25/2015
Monica Ledford	Office Manager	Maintaining Records/Annual Training	03/25/2015	01/28/2014	yes	03/25/2015

Facility Walkthrough

- **262.30- Proper DOT Containers** *Compliance Yes
Waste must be packaged in accordance with applicable DOT regulations 49 CFR 173, 178, 179.
- **262.34 (a)- Accumulation Time** *Compliance Yes
A generator may accumulate hazardous waste on-site for 90 days or less without a permit.

- **262.34 (a)(1)(i)- Storage Container Spills/Releases** *Compliance Yes
Waste must be placed in containers.
- **262.34(a)(1)(i) ref 265.176- Waste Placement** *Compliance Yes
Ignitable or reactive waste must be stored at least 50 feet from the property line
- **262.34(a)(1)(i) ref 265.177- Incompatible Waste** *Compliance Yes
(a) Incompatible waste/materials must not be placed in the same container
(b) Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste
(c) Incompatible waste must be separated while in storage
- **262.34 (a)(2)- Accumulation Start Dates** *Compliance Yes
Containers in storage must be dated when accumulation begins.

- **262.34 (a)(3)- Storage Container Labeling** *Compliance Yes
Containers in storage area must be labeled “Hazardous Waste”.

- **262.34(c)(1)- Satellite Container Spills/Releases** *Compliance Yes
No more than 55-gallons may be placed in containers at or near the point of generation under the control of the operator. No spills of hazardous waste on/around satellite accumulation containers.
- **262.34(c)(1)(i) ref 265.171- Container Condition** *Compliance Yes
Container in poor condition must be replaced.

- **262.34(c)(1)(i) ref 265.172- Container Compatibility** *Compliance Yes
Containers must be compatible with the waste they hold.

- **262.34(c) (1) (i) ref 265.173(a)- Container Management** *Compliance Yes
Containers must be maintained in a closed position unless adding or removing waste.

- **262.34(c) (1) (ii) - Satellite Container Labeling** *Compliance Yes
Satellite containers must be marked with the words “Hazardous Waste” or other words to describe the contents.

- **265.31- Maintenance and Operation of Facility** *Compliance Yes
Facility must be operated to minimize the possibility of a fire or any unplanned sudden or non-sudden release of hazardous waste that threatens health or environment.

• **265.32- Required Equipment**

***Compliance Yes**

Facilities must have the following equipment unless not needed.

- (a) Internal communications or alarm system that provides emergency instruction to personnel.
- (b) A telephone or two-way radio must be available at the scene of operation to summon emergency assistance.
- (c) Fire extinguishers and fire control equipment spill control, and decontamination equipment.
- (d) Adequate water volume and pressure to supply fire hoses, automatic sprinklers, or water spray systems.

• **265.34- Access to Communications**

***Compliance Yes**

- (a) Whenever hazardous waste is being handled, all personnel involved must have access to an alarm or communication device. Visual or voice contact is allowed.
- (b) If there is just one person at the facility, while in operation, they must have immediate access to a telephone or two-way radio capable of summoning emergency assistance.

• **265.35- Required Aisle Space (15A NCAC 13A .0110 (c))**

***Compliance Yes**

Two feet of aisle space must be maintained to allow unobstructed movement of personnel or safety equipment.

Waste Minimization Plan:

The facility has a written waste minimization plan. In addition to refitting the lighting system, making improvements in the main plating room, reducing daily water usage, timing the boiler system, improved product storage practices; They continue to track the amount of natural gas usage, use standard counter rinse methods in the plating baths to reduce water usage. Improved inspections coupled with additional training have reduced accidents and spills.

In response to sampling for their waste water permit, the facility has power washed the pits and waste troughs to remove any cyanide residues. They have segregated the Potassium cyanide/ Silver line to reduce the chance of cyanides migrating into the sewer. Residues from this line are not processed through the WWT unit, but are evaporated instead. They have also removed all hexavalent Chromium from the facility. Only trivalent Chromium remains on-site.

Less Than 90-Day Hazardous Waste Storage Area(s):

The main storage area is in the boiler building. At the time of inspection two 2-cubic yard containers were in storage. Each was labeled, dated and closed as required. Aisle space requirements were discussed. The second storage area is located within the WWT room. One 1-cubic yard container was accumulating F006 waste the time of inspection. The floor of the room is a wwt process pit and is covered with a grate, allowing spills to be returned to the process. All containers were closed and labeled.

Site Deficiencies:

None noted at this time

The Following Recommendations are offered as part of the Compliance Evaluation Inspection conducted on January 13, 2016. As mentioned in previous inspection reports, continue general maintenance schedule for housekeeping in all areas where HW is being handled and where chemicals are stored to prevent a release to the environment.



JEFF MENZEL / 02/29/2016
NC HWS-COMPLIANCE BRANCH

SENT BY E-MAIL
MONICA LEDFORD

cc:
Central Office Files
Mr. Brent Burch, Compliance Branch Head